



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

WMP
F. #2013R01203

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 6, 2015

By FedEx

Charles A. Ross, Esq.
Charles A. Ross & Associates, LLC
Trinity Centre
111 Broadway, Suite 1401
New York, NY 10006

David Usher Gourevitch, Esq.
950 Third Avenue
32nd Fl.
New York, NY 10022

Amy Walsh, Esq.
Morvillo LLP
200 Liberty Street, 27th Floor
New York, NY 10281

Roland G. Riopelle
Sercarz & Riopelle LLP
810 Seventh Avenue, Suite 620
New York, NY 10019

Re: United States v. Abraxas Discala, et al.
Criminal Docket No. 14-399 (ENV)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter. This disclosure supplements the government's earlier disclosures under cover of letters dated August 11, 2014, August 15, 2014, August 29, 2014, October 15, 2014, October 23, 2014, January 6, 2015, and January 22, 2015. The government again requests reciprocal discovery.

Enclosed is a disc containing materials specified on the attached index entitled "Discovery Production Index" (Bates stamped EDNY-ITEN-000369098 – EDNY-ITEN-000371639).

Additionally, the government is, as a courtesy, making this document and data production available as a "Concordance load file." This load file is contained on the second enclosed disc, and the documents and data on the Concordance load file have been re-Bates stamped DOJ-ITEN-000521301 to DOJ-ITEN-000523845.

Defense Counsel
May 6, 2015
Page 2

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
Shannon C. Jones
Walter M. Norkin
Patrick Hein
Assistant U.S. Attorneys
(718) 254-6379 (Jones)

Enclosure

Cc: Clerk of Court (ENV) (by ECF) (w/ enclosure)